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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SUNRISE HOSPITAL AND MEDICAL CENTER,
LLC; SUNRISE MOUNTAINVIEW HOSPITAL,
INC.; and SOUTHERN HILLS MEDICAL
CENTER, LLC,

Plaintiffs,

vs.

BLUE CROSS OF CALIFORNIA D/B/A ANTHEM
BLUE CROSS; ANTHEM BLUE CROSS LIFE AND
HEALTH INSURANCE COMPANY; and KEENAN &
ASSOCIATES, INC.,

Defendants.

Case No. 2:23-cv-01986-APG-EJY

**STIPULATION AND ORDER TO EXTEND
TIME TO FILE JOINT 26(F) REPORT
AND PROPOSED SCHEDULING ORDER
(FIRST REQUEST)**

Plaintiffs, Sunrise Hospital and Medical Center, LLC, d/b/a Sunrise Hospital & Medical Center; Sunrise MountainView Hospital, Inc., d/b/a MountainView Hospital; and Southern Hills Medical Center, LLC, d/b/a Southern Hills Hospital & Medical Center (collectively “Plaintiffs” or “the Hospitals”), and Defendants Blue Cross of California, using the trade name Anthem Blue Cross, Anthem Blue Cross Life and Health Insurance Company (collectively the “Anthem Defendants”), and Defendant Keenan & Associates, Inc. (“Keenan”) (jointly, “Defendants”) (collectively Plaintiffs and Defendants are referred to as the “Parties”), hereby stipulate as follows:

1. The current deadline to file the Joint 26(f) Report and Proposed Scheduling Order is September 9, 2024.

2. The parties have held a Rule 26(f) conference and a draft Joint Discovery Plan and Scheduling Order has been prepared and circulated. However, due to the schedules of the parties and their counsel, additional time is required to finalize the Joint Discovery Plan and Scheduling Order.

3. The Parties therefore stipulate and agree to extend the deadline to file Joint 26(f) Report and Proposed Scheduling Order from September 9, 2024 to September 16, 2024.

4. This is the first requested extension. This stipulation is made in good faith and not to delay the proceedings.

DATED this 9th day of September, 2024.

BAILEY ♦ KENNEDY

By: /s/ Joshua M. Dickey

JOSHUA M. DICKEY
PAUL C. WILLIAMS
REBECCA L. CROOKER

*Attorneys for Plaintiffs
Sunrise Hospital and Medical Center, LLC;
Sunrise MountainView Hospital, Inc.; and
Southern Hills Medical Center, LLC*

DATED this 9th day of September, 2024.

MCDOWELL HETHERINGTON LLP

By: /s/ Jennifer H. Chung

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*Attorneys for Defendants
Blue Cross of California d/b/a Anthem Blue
Cross and Anthem Blue Cross Life and Health
Insurance Company*

1 DATED this 9th day of September, 2024.

2 **LATHROP GPM LLP**

3 By: /s/ R. McKay Holley
4 MICHAEL J. ABRAMS
5 (ADMITTED PRO HAC VICE)
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9 *Attorneys for Defendant*
10 *Keenan & Associates, Inc.*

11 **IT IS SO ORDERED:**

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14 UNITED STATES DISTRICT JUDGE

15 DATED: September 10, 2024
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